

Keith Grant

From: Keith Grant
Sent: Thursday, May 16, 2024 3:59 PM
To: 'Vanessa Baehr-Jones'
Cc: Kristin E. Berexa; Emily Taylor; Linda Oxford; danny@moorerader.com; danrader@moorerader.com; Ben C. Allen; andre@moorerader.com; L Rufolo; Aaron Wells; Jon Lakey; Jessica Dowd; Marie Chrisman; sandy@hbm-lawfirm.com; Maria Ashburn; Ashley Walter; Heather Collins; Erica Russell; Elizabeth Kramer; Julie Erickson; Kevin Osborne
Subject: RE: B.P., et al. v. Johnson City, et al: Plaintiffs' Subpoenas

Okay. I will be asking the court to quash them unless you can tell me why this info is still relevant. I'm happy to discuss.

Keith H. Grant
Attorney at Law
Robinson, Smith & Wells, PLLC
633 Chestnut Street, Suite 700
Chattanooga, TN 37450
Phone: 423-756-5051
Fax: 423-266-0474
E-mail: kgrant@rswlaw.com

This is a confidential communication protected by the attorney-client privilege and the work product doctrine. If you are not the intended recipient of this communication, please delete it immediately without opening any attachments. Please notify the sender by reply e-mail that you received this e-mail or contact us at 423-756-5051.

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>
Sent: Thursday, May 16, 2024 2:40 PM
To: Keith Grant <kgrant@rswlaw.com>
Cc: Kristin E. Berexa <kberexa@fbb.law>; Emily Taylor <etaylor@watsonroach.com>; Linda Oxford <linda@eko.law>; danny@moorerader.com; danrader@moorerader.com; Ben C. Allen <ballen@fbb.law>; andre@moorerader.com; Laura Beth <lrufolo@rswlaw.com>; Aaron Wells <awells@rswlaw.com>; Jon Lakey <jlakey@bpjlaw.com>; Jessica Dowd <jdowd@fbb.law>; Marie Chrisman <mchrisman@bpjlaw.com>; sandy@hbm-lawfirm.com; Maria Ashburn <mashburn@watsonroach.com>; Ashley Walter <ashley@hmccivilrights.com>; Heather Collins <heather@hmccivilrights.com>; Erica Russell <erica@hmccivilrights.com>; Elizabeth Kramer <elizabeth@eko.law>; Julie Erickson <julie@eko.law>; Kevin Osborne <kevin@eko.law>
Subject: Re: B.P., et al. v. Johnson City, et al: Plaintiffs' Subpoenas

Keith,

Thanks for the quick response. We consider the meet and confer process complete and will move in due course. If you, or any other counsel, have a change in position in the interim, please let us know. We plan to serve the subpoenas we have been holding in abeyance tomorrow. We will serve copies on all opposing counsel again today.

-Vanessa

On Wed, May 15, 2024 at 1:43 PM Keith Grant <kgrant@rswlaw.com> wrote:

Vanessa, et al.

Sorry I'm just now getting to this. As of now, I'm not saying I won't agree to one of the options you note below for my clients, but in light of there being no claims against my clients for beneficiary liability, I don't understand the relevance of any of my clients' financial records. Please let me know why you think these documents are still relevant, or how such may lead to relevant, admissible evidence in light of the current claims, and I will assess.

Thanks.

Keith H. Grant

Attorney at Law

Robinson, Smith & Wells, PLLC

633 Chestnut Street, Suite 700

Chattanooga, TN 37450

Phone: 423-756-5051

Fax: 423-266-0474

E-mail: kgrant@rswlaw.com

This is a confidential communication protected by the attorney-client privilege and the work product doctrine. If you are not the intended recipient of this communication, please delete it immediately without opening any attachments. Please notify the sender by reply e-mail that you received this e-mail or contact us at 423-756-5051.

From: Vanessa Baehr-Jones <vanessa@advocatesforsurvivors.com>

Sent: Monday, May 13, 2024 6:50 PM

To: Kristin E. Berexa <kberexa@fbb.law>

Cc: Emily Taylor <etaylor@watsonroach.com>; Keith Grant <kgrant@rswlaw.com>; Linda Oxford <linda@eko.law>; danny@moorerader.com; danrader@moorerader.com; Ben C. Allen <ballen@fbb.law>; andre@moorerader.com; Laura Beth <lrufolo@rswlaw.com>; Aaron Wells <awells@rswlaw.com>; Jon Lakey <jlakey@bpilaw.com>; Jessica Dowd <jdowd@fbb.law>; Marie Chrisman <mchrisman@bpilaw.com>; sandy@hbm-lawfirm.com; Maria Ashburn <mashburn@watsonroach.com>; Ashley Walter <ashley@hmccivilrights.com>; Heather Collins <heather@hmccivilrights.com>; Erica Russell <erica@hmccivilrights.com>; Elizabeth Kramer <elizabeth@eko.law>; Julie Erickson <julie@eko.law>; Kevin Osborne <kevin@eko.law>

Subject: Re: B.P., et al. v. Johnson City, et al: Plaintiffs' Subpoenas

Counsel,

This email is to follow up on our telephonic meet and confer regarding Plaintiffs' subpoenas to financial institutions for Defendants' records, as well as Plaintiffs RFP #11 for Defendants' bank records. As we discussed, in an effort to avoid litigation, Plaintiffs are willing to narrow the time period for the requested records to a roughly two and a half year window: June 1, 2020, through December 31, 2022. Please advise whether that would resolve the dispute. Alternatively, we would be willing to receive bank records that are redacted to show only cash deposits over \$1,000 for the full time period. As we discussed during the meet and confer, we are also amenable to Defendants designating the complete bank records AEO if this would resolve the dispute.

Please advise no later than Thursday COB whether your clients will agree to any of the above compromises or we will plan to serve the subpoenas and seek relief from the Court with respect to RFP #11.

-Vanessa